

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

DENNIS COOK

Case No. C-1-02-073

Plaintiff(s),

Judge Weber

v.

CITY OF NORWOOD, et al.,

ADDENDUM TO PRETRIAL
FILING BY AGREEMENT

Defendant(s).

ADDENDUM TO JOINT FINAL PRETRIAL ORDER

Plaintiff hereby submits the following documents as an addendum to the Joint Final Pretrial Order in the within cause of action.

/s/Robert G. Kelly

Robert G. Kelly 0002167
Attorney for Plaintiff
4353 Montgomery Road
Norwood, Ohio 45212
1-513-531-3636
1-513-531-0135 fax
No business email

CERTIFICATE OF SERVICE

I hereby certify a copy of the foregoing was sent by regular mail this 7th day of May 2004 to the following:

Lawrence E. Barbiere (0027106) -Counsel for City of Norwood
and
Michael E. Maundrell (0027110) -Counsel for City of Norwood
Schroeder, Maundrell, Barbiere & Powers
11935 Mason Road - Suite 110
Cincinnati, Ohio 45249-3703

James F. Brockman (0009469) -Counsel for Kevin Cross
Lindhorst & Dreidame
312 Walnut Street - Suite 2300
Cincinnati, Ohio 45202

W. McGregor Dixon, Jr. (0015005) -Counsel for Joseph J. Hochbein
Shipman, Dixon & Livingston
215 West Water Street
Troy, Ohio 45373

Steven C. Martin (00178571) -Counsel for Gary Hubbard
Ziegler & Schneider
541 Buttermilk Pike - Suite 500
Covington, Kentucky 41017-5710

/s/Robert G. Kelly

Robert G. Kelly

Case No. C-1-02-073

APPENDIX B

PLAINTIFF'S PROPOSED WITNESS LIST

WITNESS LIST

EXPECTED TESTIMONY

A. DENNIS JONES

Address unknown
Phone unknown

Employee at Norwood Public Works who worked with Plaintiff and witnessed Cook's treatment at the City of Norwood and activities of Hochbein, Hubbard, Cross and workers at Norwood Public Works. He suffered under conditions created by Defendants, including Hochbein, Hubbard, Cross and Norwood that made jobs of men with disabilities more difficult because of their disability and the harassment of workers with disabilities and any fellow workers who came to their aid. Witness to the toleration of the conditions at Public Works by Mayor Hochbein. Heard repeated racial remarks by Hubbard and name calling by the Defendants about employees with disabilities including the Plaintiff, Hubbard reading Cook's medical records on the jobsite.

B. RAY ERWIN
2220 MADISON AVENUE
NORWOOD, OHIO 45212
351-8965

He will testify to all allegations contained in the complaint and witnessed treatment of workers with disabilities at the City of Norwood and activities of Hubbard, Cross, Hochbein and workers at Norwood Public Works. Lent the Plaintiff money to feed his family and Hubbard's threats to fire Cook. Hubbard's repeated racial remarks at Norwood Public Works jobsites and statements to the Plaintiff with cuss words referring to the Plaintiff. That he was instructed to seal Hubbard's driveway while on city time along with Larry partied. Required to move the city grill and other equipment to Hochbein's personal residence on City time and to

C. DENNIS COOK
4127 IVANHOE AVENUE
NORWOOD, OHIO 45212
731-9372

E. GARY HUBBARD
Last known address
SHERMAN AVENUE
NORWOOD, OHIO 45212
Phone unknown

F. TIMOTHY MOLONY
NORWOOD TREASURER
4645 MONTGOMERY ROAD
NORWOOD, OHIO 45212
456-8151

G. LEO OSTERDAY
NORWOOD PUBLIC WORKS
3001 HARRIS AVENUE
Norwood, Ohio 45212
458-4615

Hochbein's sister's house while on city time and in a city vehicle for non City events.

I will testify to my treatment at the City of Norwood and activities of Hubbard, Cross, Hochbein and workers at Norwood Public Works. I will testify I went on food stamps, free store, church pantry and borrowed from family and friends when I was denied the right to work by Hubbard, Hochbein and Cross and how I was discriminated against as detailed in the complaint because of my disability.

Hubbard will be called as on cross examination to testify concerning allegations contained in the complaint and his administration of Norwood Public Works. Drinking of moonshine on the job and providing it to other employees while on the job.

Will authenticate public records of the City of Norwood AND BENEFITS OF PLAINTIFF AND PUBLIC WORKS EMPLOYEES.

Norwood Public Works employee who will testify concerning his conversations with Cross and Hubbard and instructions received from them concerning the treatment of Cook and other employees of Norwood Public Works with disabilities. Will testify to toleration of name calling of Public Works employees, singling out of Cook by Hubbard for additional and harder jobs and Hubbard's use of him to harass the Plaintiff at Hubbard's direction. Will testify to Hubbard's direction to get Cook to quit or give him a heart attack by overworking Cook. Will also testify to Hubbard and Cross disabling the street

sweeper.

**H. JEFF SMITH
NORWOOD PUBLIC WORKS
3001 HARRIS AVENUE
NORWOOD, OHIO 45212
458-4615**

Norwood Public Works employee who will testify to his employment with the City of Norwood and his promotions and disciplinary actions in the City of Norwood, name calling at Norwood Public Works and the treatment of men with disabilities as compared to other workers.

**I. KEVIN CROSS
Norwood Public Works
3001 HARRIS AVENUE
NORWOOD, OHIO 45212**

Defendant in the within cause of action who will testify to his supervision of Cook and employees of Norwood Public Works with disabilities and treatment of other employees.

**J. JOE LACINAK
Norwood Public Works
3001 HARRIS AVENUE
NORWOOD, OHIO 45212**

Employee of Norwood Public Works who spoke with Erwin and discussed with Erwin treatment of Cook, Jones and Perkins he was afraid of losing his house and car if he didn't follow what Hubbard and Cross instructed him to do. Lacinak will testify Hubbard and Cross were out to get the Plaintiff and disabled equipment to assist Cross and Hubbard to force Plaintiff into more strenuous jobs and the removal of Mayor Hochbein's computer from his office to Public Works after the Plaintiff requested to view the records on the computer.

**K. RANDY HARRIS
FLORAL AVENUE
NORWOOD, OHIO
731-1772**

Norwood Public Works employees who will testify he witnessed the treatment of Cook and other employees with a disabilities and he used a bottle to urinate in rather than risk taking a bathroom break. He will testify the treatment of the men with disabilities by the Defendants made him physically ill and he reported it to his physician. He will testify to the stalking of men with disabilities and insulting of men with disabilities by supervisors at Norwood Public Works.

L. DONNA LAAKE
Norwood Health Department
SHERMAN AVENUE
NORWOOD, OHIO
396-8120

**She will testify to CDL drug test of the
of the Plaintiff**

M. JANET KENNEDY
4645 MONTGOMERY ROAD
NORWOOD, OHIO 45212
396-8102

**Deputy Auditor of Norwood and will
testify to the payment of benefits to
Hubbard and records maintained by the
City of Norwood. Additionally she will
testify to wages paid to plaintiff and
employees of Norwood Public Works,
benefits and other compensation paid to
employees of Norwood Public Works.**

N. PATRICIA ROARK
901 CHERRY STREET, APT. 7
BLANCHESTER, OHIO 45107
1-937-783-9160

**She will testify to money lent to the
Plaintiff as the result of the Plaintiff being
denied the right to work; changes in the
Plaintiff's attitude as the result of the
harassment; Plaintiff's continuing
complaints about his superiors at the City
of Norwood, the name calling and how the
mayor did nothing to stop it.**

O. JOSEPH MORDINO
Address unknown
Phone unknown

**He will testify to his preparation of
documents with the Defendants
disciplining older men for filing EEOC
complaints AND TO OTHER
COMMUNICATIONS AMONG THE
DEFENDANTS WHILE HE SERVED
AS ASSISTANT LAW DIRECTOR.**

P. TIMOTHY GARRY
Address unknown
Phone unknown

**He will testify to his knowledge of
activities of Norwood Public Works and
correspondence he sent concerning same
which are public records AND TO
OTHER COMMUNICATIONS AMONG
THE DEFENDANTS WHILE HE
SERVED AS LAW DIRECTOR. .**

Q. STACY WALL
Address unknown
Phone unknown

**She will testify to her preparation of
documents with the Defendants
disciplining older men for filing EEOC
complaints AND TO OTHER
COMMUNICATIONS AMONG THE**

DEFENDANTS WHILE SHE SERVED AS ASSISTANT LAW DIRECTOR.

**R. JOSEPH HOCHBEIN
4645 MONTGOMERY ROAD
NORWOOD, OHIO 45212
458-81511**

He will testify he is a “hands on mayor” and there is little that goes on in the City of Norwood without his knowledge. He will also testify he organized, approved and encouraged the discrimination against older men OR FAILED TO SUPERVISE OR TRAIN HUBBARD OR CROSS WHILE THEY WERE EMPLOYED BY THE CITY OF NORWOOD.

**S. ROGER PERKINS
1919 ELM AVENUE
NORWOOD, OHIO 45212
Phone unknown**

He will testify to Defendants attempting to get rid of men with disabilities by forcing them from their jobs, vulgar language and treatment of disabled men by the Defendants and the discrimination against them and Hubbard reading the Plaintiff’s medical records to him on the job site.

**T. PEGGY SNAPP
2319 WILLIAMS AVENUE
NORWOOD, OHIO 45212
531-4531**

She is the former Safety Service Director of the City of Norwood and she will testify to the Plaintiff’s character and his work ethic.

**U. THOMAS F. WILLIAMS
VARELMAN AVENUE
NORWOOD, OHIO 45212
Phone unknown**

Former captain of the Norwood Police Department who will testify Cook was detained by Norwood Police as the result of picking up his paycheck and the use of the Norwood Police Department personnel to repeatedly visit the Plaintiff’s residence at the request of the Defendants.

**V. DAVID FOX
657 North Wayne Avenue
Cincinnati, Ohio 45215
577-7900**

Manager at Contract Sweepers who will testify to the work habits of the Plaintiff, hours worked, duties performed and income earned. He will testify to hours and days missed due to Cook being subjected to unlawful discrimination by the Defendants.

**W. REBA NAZZARINI
Address unknown**

SHE WILL TESTIFY SHE WAS AT LOWER MILLCREST PARK IN THE

Hamilton County, Ohio

CITY OF NORWOOD WHEN CROSS ACCOSTED HER IN THE PRESENCE OF PUBLIC WORKS EMPLOYEES AND LACINAK INTERVENED TO STOP CROSS FROM HARMING OR OTHERWISE HARASSING HER.

**X. RUTH CAIN
Krug Circle
Norwood, Ohio 45212**

WILL TESTIFY TO DISCUSSIONS AMONG CROSS, HOCHBEIN AND HUBBARD CONCERNING ACTIONS TAKEN AGAINST COOK WHEN SHE WAS A MEMBER OF NORWOOD CITY COUNCIL.

**Y. MELISSA ANDLER
4645 Montgomery Road
Norwood, Ohio 45212**

WILL TESTIFY CONCERNING THE DUTIES SHE PERFORMED AS THE SECRETARY FOR GARY HUBBARD INCLUDING THE TYPING OF ITEMS OF CORRESPONDENCE AND FORMS WHILE SHE WAS THE SECRETARY FOR GARY HUBBARD.

**Z. VICTOR HARRIS
street address unknown
Solon, Ohio (last known city and state of residence.**

**SEE SWORD STATEMENT
DISCOVERED BY THE
PLAINTIFF ON APRIL 3, 2003.**

Plaintiff intends to call one or more of the Defendants as if on cross examination.

PLAINTIFF'S EXHIBITS - APPENDIX E
DENNIS COOK VS. CITY OF NORWOOD, ET AL. - CASE NO. C-1-02-073

E X H I B I T

P0001 SIGNED BY COOK MEMOS ISSUED BY CROSS

P0002 SIGNED BY JONES MEMOS ISSUED BY CROSS

P0003 SIGNED BY PERKINS MEMOS ISSUED BY CROSS

P0004 CERTIFIED COPIES OF DRIVER'S LICENSES OF NORWOOD
PUBLIC WORKS EMPLOYEES

P0005 PERSONAL PROPERTY OF CITY EMPLOYEES BEING BROKEN

P0006 NO CHANGING OF TIME SHEETS

P0007 PROHIBITION AGAINST SHORTS

P0008 CITY NOT RESPONSIBLE FOR PERSONAL ITEMS

P0009 BLOODBORNE PATHOGENS TRAINING

P0010 NOTICE OF UNFAIR LABOR PRACTICE HEARING ON JONES
REINSTATEMENT

P0011 SICK LEAVE PROCEDURE 9/3/98

P0012 LEADMAN RESPONSIBLE FOR SAFETY EQUIPMENT NO DATE

P0013 BAZZANO LETTER THAT HE WILL HEAR GRIEVANCES 12350,

E X H I B I T

4688, 12345, 12338, 5694, 5695 AT STEP 3

P0014 BAZZANO LETTER 8/11/98 TO ERWIN DENYING ERWIN
GRIEVANCE #123381 AT 3RD STEP

P0015 BAZZANO LETTER 8/11/98 TO PERKINS REF GRIEVANCE #12350
AND DENIAL OF SAME

P0016 BAZZANO LETTER 8/11/98 TO JONES

P0017 BAZZANO LETTER 8/26/98 TO PERKINS CONCERNING
PRESUSPENSION HEARING

P0018 CAMERON LETTER 4/1/98 TO COOK REF NEW HEARING DATE
ON DISCIPLINE CHARGE FOR THE BANK TRIP

P0019 COOK LETTER TO HUBBARD REF CATCH BASIN INSTAL-
LATION DATED 4/8/98

P0020 COOK LETTER TO CROSS REF HOT PATCH DATED 4/8/98

P0021 DENIAL OF COOK WHISTLE BLOWER LAWSUIT DATED 9/2/98

P0022 COOK LETTER 4/3/96 TO EDWARDS REF LABOR MANAGE-
MENT MEETING

P0023 COOK LETTER 12/31/95 TO EDWARDS REF VARIETY OF ISSUES
INCLUDING SAFETY ISSUES

P0024 COOK HEAVY EQUIPMENT OPERATOR 5/24/95

P0025 ERWIN LETTER 9-12-97 TO HUBBARD REF ZIMMERMAN AND
SMITH PICKING NUMBERS FOR WATER CREW

E X H I B I T

P0026	ERWIN LETTER 3/12/98 REF REFUSAL OF CROSS TO ACCEPT GRIEVANCE PRESENTED BY COOK ON 3/11/98
P0027	ERWIN LETTER TO CROSS 8/19/98
P0028	JONES LETTER 5/22/96 TO CROSS REF SUPPORT
P0029	JONES EEOC COMPLAINT DATED 4/27/98
P0030	JONES FAX 8/21/98 TO CROSS THAT JONES WAS NOT RESIGNING POSITION
P0031	POSITION AND LETTER TO CROSS THAT HE WAS HOSPITALIZED DATED 8/20/98
P0032	LETTER FROM LACINAK TO CROSS REQUESTING TO USE LUNCHROOM FOR UNION ELECTIONS DATED 8/24/98
P0033	DENNIS COOK'S W-2 STATEMENTS
P0034	MAXWELL LETTER 3/2/95 TO SULLIVAN REF GRIEVANCE #12712 FILED BY ERWIN AND RELEASING UNION OFFICERS FROM WORK TO ATTEND GRIEVANCE HEARING
P0035	MAXWELL LETTER 7/27/95 REQUESTING LICENSE INFORMATION FOR UNION MEMBERS P06784; GRIEVANCE #7402 FILED 7/14/94 BY COOK CLASS ACTION POLICY GRIEVANCE CONCERNING REFUSAL TO TIMELY HEAR GRIEVANCES
P0036	MAXWELL LETTER 8/29/95 RESPONDING TO COOK REQUEST TO HAVE COUNCILPERSON HUBBARD ATTEND LABOR MANAGEMENT MEETING
P0037	MAXWELL LETTER 12/8/95 TO COOK ESTABLISHING CALL IN POLICY FOR OVERTIME AND THE NEED FOR BEEPER
P0038	OSTERDAY LETTER REF COOK APRIL, 1998

E X H I B I T

P0039	POTTEBAUM'S LETTER TO HOCHBEIN DATED 5/20/99
P0040	STAPLETON AGREEMENT TO RETURN TO WORK DATED 3/25/98 NOT SIGNED BEY ERWIN
P0041	WALL LETTER DATED 4/13/99 REFERENCE EMPLOYEES NOT REQUIRED TO SIGN FOR MEMOS
P0042	LETTER FROM VANOVER TO CROSS REF GRIEVANCE # 1085 REF MAIL PICKUP DATED 10/7/99
P0043	WHITE LETTER OF RESIGNATION DATED 4/20/98
P0044	SETTLEMENT AGREEMENT FOR MISUSE OF CITY EQUIPMENT ON MARCH 25, 1998
P0045	HANDWRITTEN LETTER BY UNKNOWN SUBJECT
P0046	HANDWRITTEN LETTERS OF UNKNOWN WRITER DATED 4/18/96
P0047	LISTING OF PERSONNEL FOR CITY OF NORWOOD AS OF 11/14/95
P0048	MEMO ADDRESSING VACATION AND TIME OFF BY COOK
P0049	RESULTS OF BUMPING RIGHTS FOR PUBLIC WORKS 1/15/96 AS TO COOK
P0050	CDL LICENSE FOR HARRIS DATED OR EXPIRES IN 1998
P0051	CDL LICENSE FOR COOK DATED OR RECEIVED BY CITY ON 1/17/96
P0052	CDL LICENSE FOR COOK DATED 3/31/94
P0053	LICENSE FOR OSTERDAY DATED 2/8/97 WHICH IS A TEMPORARY PERMIT

E X H I B I T

P0054	LICENSE FOR ZIMMERMAN DATED 7/11/97
P0055	TEMP. LICENSE FOR SMITH DATED 12/26/96
P0056	LICENSE FOR REX PENNINGTON DATED 7/28/97
P0057	LICENSE FOR DYKES DATED 10/21/96
P0058	LICENSE FOR ZIMMERMAN ISSUED 9/25/96
P0059	LICENSE FOR SEXTON ISSUED
P0060	LABOR MANAGEMENT AGREEMENT FOR PERIOD 1/1/97 THRU 12/31/99
P0061	TONY PENNINGTON'S VACATION RECORD DATED 1/6/99
P0062	LICENSE OF OSTERDAY ISSUED 5/13/96
P0063	CDL LICENSE OF ERWIN ISSUED 7/17/93
P0064	LICENSE OF WHITE ISSUED DATE UNKNOWN
P0065	LICENSE OF PERKINS ISSUED DATE UNKNOWN
P0066	LICENSE OF LACINAK ISSUED 1/16/93
P0067	TONY PENNINGTON'S VACATION RECORD DATED 2/19/99
P0068	TONY PENNINGTON'S VACATION RECORDED DATED 6/22/98
P0069	COOK, ERWIN, HARRIS, JONES, LYNN, SEXTON, SHANAHAN and WALTZ VALID CDL LICENSE
P0070	LICENSE OF SEXTON DATED 3/4/94
P0071	TEMPORARY LICENSE OF LARRY PARTIN ISSUED 11/13/97

E X H I B I T

P0072	LICENSE OF DYKES ISSUED 10/21/96
P0073	CDL LICENSE OF DENNIS JONES ISSUED 9/5/95
P0073	VALVE CLOSING PAPERWORK
P0074	LETTER TO BAZZANO CONCERNING PERKINS GRIEVANCE #12350, GRIEVANCE 4688 GRIEVANCE 12356 GRIEVANCE 12338 GRIEVANCE 5694 GRIEVANCE 5695
P0075	LABOR MANAGEMENT MEETING ON 5/3/99 REFERENCE PERSONAL PROPERTY
P0076	LETTER 6/26/96 TO EDWARDS REF COOK GRIEVANCE #384 AND #413 (BACKHOE) DENYING SAME AND GRIEVANCE #385 REMOVING WRITTEN REPRIMAND
P0077	EDWARDS LETTER 6/6/96 TO HUBBARD TO FOLLOW THE CONTRACT CONCERNING GRIEVANCE HEARINGS CONCERNING COOK
P0078	EDWARDS LETTER 8/14/96 TO COOK ABOUT COOPERATION OR RISK PRIVATIZATION
P0079	EDWARDS LETTER 6/1/98 TO HUBBARD WITHDRAWING GRIEVANCE 12332 12334 12335 12336 12337 12339;
P0080	HOCHBEIN DECISION ON COOK GRIEVANCE #384, #413 AND #392 DATED 8/2/96 DENYING ALL
P0081	HOCHBEIN LETTER 11/18/97 FOR POSTING OF B1 MECHANIC
P0082	HOCHBEIN LETTER 3/12/98 TO ERWIN DENYING GRIEVANCE 12324 AT STEP THREE
P0083	HOCHBEIN LETTER DATED TO EDWARDS REF STATEMENT OF

E X H I B I T

UNDERSTANDING DATED 4/20/98

P0084	HOCHBEIN LETTER 10/9/98 TO EDWARDS
P0085	HOCHBEIN LETTER TO EDWARDS CONCERNING GRIEVANCE 12324 12331 12315 12322 12323 12325 12326 12327 12328 12329 12330 AND REFUSING TO HOLD HEARINGS ON 12315 12322 12323 12325 12326 12327 12328 12329 12330
P0086	MEMO BY HUBBARD ABOUT DUMPING
P0087	HUBBARD LETTER 12/21/95 TO PERKINS RESPONDING TO PERKINS LETTER DATED 12/18/95 CONCERNING HUBBARD
P0088	HUBBARD LETTER 4/3/96 TO CROSS REF POSTING FOR WATER LABORER B-1
P0089	HUBBARD LETTER 4/8/96 TO CROSS REF POSTING OF JOB FOR BACKHOE OPERATOR
P0090	HUBBARD LETTER TO CROSS 5/13/96 REF POSTING FOR STREET SWEEPER OPERATOR, BACKUP POSITION
P0091	CLINT ZIMMERMAN SICK LEAVE REQUEST DATED 3/5/97
P0092	HUBBARD LETTER 6/17/96 TO CROSS REF SICK AND VACATION TIME
P0093	HUBBARD LETTER 6/19/96 TO CROSS THAT TO TAKE A VACATION DAY REQUIRES 48 HOURS NOTICE
P0094	HUBBARD LETTER 6/26/96 TO COOK WITH PROVISIONAL APPOINTMENTS
P0095	HUBBARD LETTER 6/26/96 TO COOK PUTTING HIM BACK TO WORK HUBBARD

E X H I B I T

P0096	HUBBARD LETTER 8/8/96 TO EDWARDS REF EMPLOYEES OFF WORK COOK, GIBSON AND SHANAHAN
P0097	HUBBARD LETTER 10/30/96 DENYING COOK GRIEVANCE 417, 418, 419 AND 420
P0098	TARDY POLICY PER HUBBARD 6/24/97
P0099	HUBBARD LETTER 12/18/97 TO CROSS REF MEETING WITH LEADMEN
P0100	HUBBARD LETTER 11/19/97 TO ERWIN REF B1 MECHANIC, CHANGE STARTING HOURS, EVERYONE HIRED MUST HAVE CDL, BI-WEEKLY PAY AND CHANGE OF HOURS
P0101	HUBBARD LETTER 11/10/97 REF ACTING LEADMAN PAY AND COPY TO CROSS
P0102	HUBBARD LETTER 10/16/97 TO CROSS COMPLAINING ABOUT POLICE COMPLAINING ABOUT COOK
P0103	HUBBARD LETTER 10/21/97 REF DYKES GRIEVANCE 12315 REF ROTATING JOB AND PAYING AS A CRAFTSMAN
P0104	HUBBARD LETTER 10/21/97 REF SMITH GRIEVANCE #12316 REF B1 MECHANIC POSITION
P0105	HUBBARD LETTER 10/21/97 TO ERWIN REF SMITH GRIEVANCE
P0106	HUBBARD LETTER 10/31/97 TO CROSS CHANGING WORK HOURS
P0107	HUBBARD LETTER 10/31/97 TO ERWIN REF POSTING FOR CRAFTSMAN LEADMAN
P0108	HUBBARD LETTER 10/31/97 TO CROSS REF VACATION POSTING FOR 1998

E X H I B I T

P0109	HUBBARD LETTER TO CRAFTSMEN COPY TO CROSS THAT ALL LEADMEN LEAVE WITHOUT TARDY WORKERS AND CHANGE OF HOURS IF NECESSARY
P0110	LUNCH POLICY PER HUBBARD EFF. 10/31/97
P0111	HUBBARD BIWEEKLY PAY LETTER 11/5/97
P0112	LUNCH POLICY PER HUBBARD EFF. 12/18/97
P0113	HUBBARD LETTER 12/18/97 TO COOK REF CLEANING STREETS AND CONDITION OF TRUCK DISCIPLINE
P0114	HUBBARD LETTER 12/18/97 TO ERWIN
P0115	HUBBARD LETTER 1/5/98 DENYING GRIEVANCE #12328 AND DENYING GRIEVANCE #12327
P0116	HUBBARD LETTER 1/6/98 LETTER TO ERWIN REF DRUG POLICY AND GRIEVANCE 13324 AND GRIEVANCE 13327
P0117	HUBBARD LETTER 1/6/98 TO ERWIN
P0118	HUBBARD LETTER 1/6/98 TO ERWIN
P0119	HUBBARD LETTER 1/6/98 TO ERWIN
P0120	HUBBARD LETTER 1/6/98 TO ERWIN
P0121	HUBBARD LETTER TO ERWIN DATED 1/13/98 REF NO REOPENER
P0122	HUBBARD AN CROSS NORWOOD DRUG AND ALCOHOL POLICY DATED 1/14/98
P0123	HUBBARD LETTER 1/16/98 TO ERWIN

E X H I B I T

P0124 HUBBARD LETTER 1/16/98 TO CROSS CHANGING HOURS

P0125 HUBBARD LETTER 1/16/98 TO ERWIN

P0126 HUBBARD LETTER 1/21/98 TO CROSS REF NEW HOURS FOR
PUBLIC WORKS

P0127 HUBBARD LETTER 2/13/98 TO ERWIN

P0128 HUBBARD LETTER 2/18/98 TO ERWIN

P0129 COOK LETTERS ON SECURING TRUCK REQUESTED BY
HUBBARD 4/9/98

P0130 CLINT ZIMMERMAN SICK LEAVE REQUEST DATED 8/21/98

P0131 HUBBARD TO CROSS ON CONDITION OF TRUCKS DATED
4/15/98

P0132 HUBBARD LETTER TO CROSS NO PERSONAL USE OF CITY
EQUIPMENT 4/13/98

P0133 LETTER TO COOK AND ERWIN FROM HUBBARD DATE 4/16/98

P0134 HUBBARD'S INITIAL RESPONSE TO COOK WORKPLACE
VIOLENCE LETTER AND LACINAK, DYKES, EDWARDS AND
RESPONSE DATED 4/20/98

P0135 HUBBARD LETTER TO COOK ABOUT WORKPLACE VIOLENCE
DATED 4/21/98 REF DYKES LACINAK ERWIN AND PARTIN
COMMENTS AND DISCIPLINARY ACTION

P0136 HIRING PSARA TO INSTRUCT ON OSHA PER HUBBARD 4/22/98

P0137 HUBBARD LETTER 5/7/98 TO WIMMERS TO REINSTATE SICK
AND VACATION FOR PERKINS

E X H I B I T

P0138 HUBBARD LETTER 5/20/98 TO CROSS REMOVING COOK FROM OPERATING SWEEPER

P0139 HUBBARD LETTER 7/10/98 TO EDWARDS REF GRIEVANCE 4688, 912338, 12345 AND 12350

P0140 HUBBARD LETTER 8/7/98 TO ERWIN CONCERNING GRIEVANCE #5154 AND GRIEVANCE #5155

P0141 HUBBARD LETTER 8/11/98 TO ERWIN

P0142 USE OF CITY EQUIPMENT FOR PERSONAL USE HUBBARD MEMO DATED 9/3/98

P0143 HUBBARD LETTER 9/22/98

P0144 HUBBARD LETTER 10/1/98 TO EDWARDS

P0145 HUBBARD LETTER 10/1/98 TO EDWARDS

P0146 HUBBARD LETTER 10/2/98 TO EDWARDS

P0147 CLINT ZIMMERMAN VACATION LEAVE REQUEST DATED 6/15/98

P0148 CLINT ZIMMERMAN VACATION LEAVE REQUEST DATED 9/15/97

P0149 CLINT ZIMMERMAN VACATION LEAVE REQUEST DATED 2/10/98

P0150 GRIEVANCE #12323 FROM HUBBARD DENIED 12/18/98
REF WHITE

P0151 HUBBARD LETTER TO COOK DISPOSING OF GRIEVANCE 384,

EXHIBIT

385, 413, 13392, 399, 408, 409, 410, 411 AND 412

P0152	HUBBARD LETTER 12/28/98 TO COOK
P0153	HUBBARD LETTER 1/6/99 TO EDWARDS
P0154	HUBBARD LETTER 1/6/99
P0155	HUBBARD POSTING FOR WATER REPRESENTATIVE-LABORER-TRUCK DRIVER 6/4/99
P0156	HUBBARD LETTER 6/4/99 TO EDWARDS ADDING DUTY TO POSTING FOR WATER REPRESENTATIVE LABOR TRUCK DRIVER OF HAND DIGGING
P0157	HUBBARD LETTER UNDATED TO CROSS REF POSTING FOR BACKHOE OPERATOR
P0158	MORDINO LETTER 4/14/98 TO COOK
P0159	LACINAK VACATION RECORDS FOR 1997 WHERE HE WAS IN THE NEGATIVE
P0160	LYNN VACATION RECORD FOR 1997
P0161	PARTIN SICK RECORD FOR 1997
P0162	PENNINGTON SICK AND VACATION 1997
P0163	PERKINS SICK AND VACATION FOR 1997
P0164	HARRIS SICK AND VACATION FOR 1997
P0165	SEXTON SICK AND VACATION FOR 1997
P0166	BRATTON SICK AND VACATION FOR 1997

E X H I B I T

P0167 COOK SICK AND VACATION FOR 1997

P0168 DYKES SICK AND VACATION FOR 1997

P0169 ENDERLIN SICK AND VACATION FOR 1997

P0170 ERWIN SICK AND VACATION FOR 1997

P0171 VANOVER SICK AND VACATION FOR 1997

P0172 SMITH SICK AND VACATION FOR 1997

P0173 WALTZ SICK AND VACATION FOR 1997

P0174 WHITE SICK AND VACATION FOR 1997

P0175 ZIMMERMAN SICK AND VACATION FOR 1997

P0176 GIBSON SICK AND VACATION FOR 1997

P0177 GRIEVANCE #7420 FILED 6/2/95 BY BRATTON CONCERNING
CALL OUT FOR OVERTIME

P0178 GRIEVANCE # 7421 FILED 6/19/95 BY ERWIN CONCERNING
CALL OUT FOR OVERTIME

P0179 GRIEVANCE #13396 FILED BY WHITE 6/21/95 CONCERNING
IMPROPER CALL OUT

P0180 GRIEVANCE #7399 FILED BY COOK, JONES, PERKINS 9-29-95
CONCERNING HIRING OF SEASONAL EMPLOYEES

P0181 GRIEVANCE # 404 FILED 10/24/95 BY DENNIS JONES
CONCERNING HIM PERFORMING A-1 MECHANICS POSITION

P0182 GRIEVANCE # 407 FILED BY STAPLETON 1/24/96 CONCERNING
DENIAL OF SENIORITY RIGHTS AFTER REINSTATEMENT AND

EXHIBIT

ALL RIGHTS RESTORED

P0183	GRIEVANCE #410 FILED BY COOK AND PERKINS 4/8/96 CONCERNING THE ISSUANCE OF MEMOS WITHOUT MGT SIGNATURES AND HEARD BY CROSS
P0184	GRIEVANCE #408 OR 468 FILED BY COOK AND PERKINS 4/8/96 CONCERNING THE CITY'S REFUSAL TO HONOR PAST PRACTICES AND IT WAS HEARD BY CROSS
P0185	GRIEVANCE #412 FILED BY COOK DATED 4/8/96 CONCERNING HARASSMENT HEARD BY CROSS AND DENIED
P0186	GRIEVANCE #411 FILED BY COOK 4/8/96 CONCERNING APPOINTING A LESS SENIOR MAN TO HIS POSITION AND IT WAS HEARD BY CROSS
P0187	GRIEVANCE #399 OR 309 FILED BY COOK 4/19/96 CONCERNING RADIO HARASSMENT GETTING HOT MIX
P0188	GRIEVANCE #413 FILED BY COOK ON 4/22/96 CONCERNING DENIAL OF RIGHT TO BUMP HEAVY EQUIPMENT POSITION
P0189	GRIEVANCE #13392 FILED BY COOK 4/22/96 CONCERNING FAILURE TO POST BACKHOE POSITION PROPERLY 13392;
P0190	GRIEVANCE #417 FILED BY COOK 9/11/96 CONCERNING DENIAL OF PAYMENT TO OVERTIME TO COOK AS HEAVY EQUIPMENT OPERATOR
P0191	GRIEVANCE #418 FILED BY COOK CONCERNING DENIAL OF OVERTIME TO COOK AND AWARDED TO NONUNION EMPLOYEE
P0192	GRIEVANCE #419 FILED BY COOK 9/13/96 CONCERNING EQUALIZATION OF OVERTIME

E X H I B I T

P0193 GRIEVANCE #420 FILED BY COOK 9/13/96 CONCERNING DENIAL OF PAGER TO COOK

P0194 GRIEVANCE #409 OR 469 FILED BY COOK AND PERKINS 4/8/96 CONCERNING REQUIREMENT TO CALL A BOSS THAT YOU WERE SICK INSTEAD OF A COWORKER AND HEARD BY CROSS

P0195 GRIEVANCE #384 FILED BY COOK 4/16/96 CONCERNING IMPROPER POSTING OF BACKHOE POSITION

P0196 GRIEVANCE #385 FILED BY COOK 4/16/96 CONCERNING APPEAL OF WRITTEN REPRIMAND

P0197 GRIEVANCE #12329 DATED 1/13/98

P0198 GRIEVANCE #12333 DATED 3/2/98

P0199 GRIEVANCE #12334 FILED 3/11/98

P0200 GRIEVANCE #12332 DATED 3/16/98

P0201 GRIEVANCE #12335 DATED 3/16/98

P0202 GRIEVANCE # 12336 FILED 3/23/98

P0203 GRIEVANCE # 12339 FILED 3/24/98

P0204 GRIEVANCE #12338 DATED 3/24/98 FILED

P0205 GRIEVANCE #12341 FILED 4/17/98 BY COOK CONCERNING FAILURE TO PAY COOK FOR WORKING PAST 8 HOURS

P0206 GRIEVANCE #12343 FILED 4/17/98 BY ERWIN CONCERNING DENIAL OF USE OF HIM AS HEAVY EQUIPMENT OPERATOR

P0207 GRIEVANCE #12340 FILED 4/17/98 BY COOK CONCERNING DENIAL OF LEADMAN POSITION

EXHIBIT

P0208 GRIEVANCE #12337 FILED 4/17/98 BY COOK CONCERNING DENIAL OF VACATION AFTER APPLICATION IN A TIMELY MANNER

P0209 GRIEVANCE 1234 FILED 5/14/98 BY JONES OVER VACATION DISPUTE

P0210 GRIEVANCE #12350 FILED 5-15-98 BY PERKINS

P0211 GRIEVANCE #12356 FILED 5/15/98

P0212 GRIEVANCE #4688 FILED 5/20/98

P0213 GRIEVANCE #4692 FILED 7/10/98 BY PERKINS CONCERNING DENIAL OF BUMPING RIGHTS TO STAY ON PARK CREW

P0214 GRIEVANCE #4693 FILED JULY 10, 1998 BY COOK CONCERNING DENIAL OF BUMPING RIGHTS

P0215 GRIEVANCE #5694 FILED 7/12/98

P0216 GRIEVANCE #5695 FILED 7/12/98 BY STAPLETON CONCERNING DISCRIMINATION AGAINST HIM

P0217 GRIEVANCE 5149 FILED 7/22/98 BY COOK CONCERNING BEING REQUIRED TO TAKE A SECOND EXAMINATION BY MARZELLA

P0218 GRIEVANCE 5146 FILED 7/22/98 FILED BY PERKINS CONCERNING FAILURE OF THE CITY TO PROVIDE BUMPING RIGHTS TO SENIOR MEN

P0219 GRIEVANCE 5171 FILED 7/31/98 FILED BY PERKINS CONCERNING FAILURE OF THE CITY TO PROVIDE BUMPING RIGHTS TO SENIOR MEN BY REFUSING TO PERMIT HIM TO BUMP INTO A DEPARTMENT

E X H I B I T

P0220	GRIEVANCE #5194 FILED BY PERKINS DATED 7/31/98
P0221	GRIEVANCE #5151 FILED 7/31/98 BY COOK
P0222	GRIEVANCE #5195 FILED BY COOK DATED 8/2/98
P0223	GRIEVANCE # 6806 FILED 8/21/98 BY JONES CONCERNING HIS RESIGNATION
P0224	GRIEVANCE #5696 DATED 9/30/98
P0225	GRIEVANCE #1085 FILED BY DYKES REF MAIL PICKUP 10/25/99 AND RELIEF GRANTED BY CROSS
P0226	TIME SHEET AND TIME CARD POLICY PER CROSS NO DATE
P0227	HANDWRITTEN NOTES OF CROSS CONCERNING NOTIFICATION TO BAZZANO PRIOR TO GRIEVANCE HEARINGS AT 3RD STEP
P0228	LEADMAN RESPONSIBLE FOR SAFETY EQUIPMENT BY CROSS NO DATE
P0229	CROSS POSTING FOR BACK UP BUS DRIVER 6/3/96
P0230	CROSS LETTER 6/4/96 TO PERKINS DENYING COOK GRIEVANCE #393 AND ADDRESSING MEDICAL EXAMINATION AND EXCUSE
P0231	CROSS POSTING FOR STREET SWEEPER OPERATOR, BACKUP POSITION 6/4/96
P0232	CROSS POSTING FOR PARK CREW LEADMAN DATED 6/11/96
P0233	CROSS LETTER 6/26/96 TO HUBBARD APPOINTING LYNN LEADMAN

E X H I B I T

P0234 CROSS POSTING FOR TRUCK DRIVERS 10/23/96

P0235 CLINT ZIMMERMAN SICK LEAVE REQUEST DATED 6/24/98

P0236 CROSS LETTER 9/17/96 TO PERKINS SETTING HEARING ON GRIEVANCE #418, #419 AND #420

P0237 SICK LEAVE POLICY ON 1/10/97 PER CROSS

P0238 CROSS LETTER 1/16/97 TO HUBBARD REF JOB ASSIGNMENTS FOR 1998

P0239 CROSS LETTER 2/13/97 TO PERKINS REF LETTER 2/5/97 THAT THE RULES ARE IN THE CONTRACT

P0240 CROSS LETTER TO PERKINS 8/11/97 DENYING STAPLETON GRIEVANCE #12314

P0241 CROSS LETTER 11/6/97 TO HUBBARD REF ACTING LEADMAN PAY

P0242 LUNCHTIME HOURS PER CROSS DATE 11/10/97

P0243 VACATION POLICY PER CROSS TO TURN IN TWO WEEKS IN ADVANCE

P0244 CHAIN OF COMMAND AT PUBLIC WORKS PER CROSS 2/20/97

P0245 CROSS LETTER REF HOURS CHANGED 8/12/97 AND WORKING THROUGH LUNCH

P0246 ACCIDENT POLICY FOR PUBLIC WORKS PER CROSS 9/26/97

P0247 LEADMAN RESPONSIBILITY PER CROSS 10/2/97

P0248 GRIEVANCE DECISION BY CROSS DATED 10/22/97 ON ENDERLIN #12320

EXHIBIT

P0249	LUNCH POLICY PER CROSS EFF 12/18/97
P0250	CROSS LETTER 1/14/98 TO ERWIN
P0251	CLINT ZIMMERMAN VACATION LEAVE REQUEST DATED 2/10/98 2/10/98
P0252	CITY OF NORWOOD LEADMAN DUTIES AS SET FORTH BY
P0253	CROSS LETTER TO ERWIN 2/24/98 POSTPONING GRIEVANCE
P0254	CROSS LETTER 2/26/98 REF DAILY WORK LOGS
P0255	CROSS LETTER 2/26/98 THAT ALL CREWS SHOULD NOT BE IN PUBLIC WORKS 15 MINUTES PRIOR TO QUITTING TIME
P0256	CROSS LETTER 3/2/98 TO ERWIN REF DATE STAMPING GRIEVANCES
P0257	CHANGE OF HOURS FROM CROSS TO PUBLIC WORKS DATED 3/9/98
P0258	CROSS LETTER 3/17/98 DENYING GRIEVANCES #12333 AND #12334
P0259	CROSS LETTER 4/20/98 TO COOK AND ERWIN REF GRIEVANCE #12332 REF BACKHOE OPERATOR POSITION
P0260	LUNCH MUST BE TAKEN PER CROSS 4/22/98
P0261	LETTER FROM CROSS TO HUBBARD ABOUT COOK BEING OUT OF STREET SWEEPER ON 4/22/98
P0262	STATEMENT OF KEVIN CROSS DATED 5/4/98 REF JONES AGE DISCRIMINATION SUIT COOK
P0263	CROSS LETTER 5/21/98 TO LACINAK DENYING PERKINS

EXHIBIT

GRIEVANCE #4688

P0264	CROSS LETTER 5/21/98 TO LACINAK REF GRIEVANCE #12345 AND GRIEVANCE #12350 REF JONES AND PERKINS' GRIEVANCES AND ALL WERE DENIED
P0265	CROSS LETTER 7/31/98 TO LACINAK DENYING GRIEVANCE #4692
P0266	CROSS LETTER 7/31/98 TO LACINAK DENYING PERKINS GRIEVANCE 4692 AT FIRST STEP
P0267	CROSS LETTER 7/31/98 TO LACINAK DENYING COOK GRIEVANCE 4693 CONCERNING BUMPING WHEN HE WENT HOME WHEN HE WAS TOLD TO RUN THE AIR HAMMER BY OSTERDAY AT HUBBARD INSISTENCE
P0268	CROSS LETTER 8/3/98 DENYING GRIEVANCES 5151 5194 AND 5195 AT STEP 1
P0269	CROSS LETTER 8/3/98 DENYING COOK GRIEVANCE 5149 CONCERNING REPEATED EXAMINATIONS
P0270	CROSS LETTER 8/3/98 DENYING GRIEVANCE 5146 AND 5147 OF PERKINS BECAUSE CROSS BELIEVES THEM TO BE A DUPLICATION OF 4692
P0271	CROSS LETTER 8/3/98 DENYING GRIEVANCE 5194
P0272	CROSS LETTER 8/12/98 TO PERKINS
P0273	CROSS LETTER 8/13/98 TO LACINAK REFERENCE ERWIN GRIEVANCE #6804
P0274	ALL PUBLIC WORKS EMPLOYEES MUST TAKE LUNCH EFF. 8/13/98 PER CROSS

E X H I B I T

P0275 CROSS LETTER 8/13/98 DENYING JONES GRIEVANCE #5173 FOR NORWOOD DAY AND GRIEVANCE ATTACHED

P0276 CROSS LETTER 8/14/98 TO JONES ACCEPTING HIS RESIGNATION

P0277 CROSS LETTER 8/18/98 TO HOCHBEIN CONCERNING A HEARING ON 8/20/98 FOR COOK WITH TRANSCRIPT ATTACHED OF HEARING

P0278 CROSS LETTER 8/19/98 TO WIMMERS

P0279 CROSS LETTER 8/21/98 TO ERWIN THAT HE DIDN'T HAVE TO HOLD A HEARING FOR A MAN WHO QUIT CONCERNING JONES

P0280 CROSS LETTER 8/21/98 TO HOCHBEIN

P0281 CROSS GIVES PERMISSION TO USE CITY PROPERTY TO LACINAK DATED 8/26/98

P0282 CROSS LETTER 9/22/98 TO GARRY

P0283 LETTER FROM CROSS TO HOCHBEIN REQUESTING TERMINATION OF PERKINS DATED 10/22/98 AND LISTING HYDRANTS CLOSED

P0284 CROSS LETTER 11/30/98 TO VANOVER

P0285 CROSS LETTER TO VANOVER DENYING COOK OPERATION OF BACK-HOE DATED 12/1/98

P0286 CROSS LETTER TO WHITE REF LEADMAN PAY FOR COOK AND WHETHER COOK IS IN THE STREET DEPT. OR IF IT IS A SEPARATE CLASSIFICATION DATED 2/16/99

P0287 CROSS LETTER TO WHITE REF SAFETY POLICY AND PROCEDURE MANUAL AND PROBLEM FOLLOWING PROCEDURES DATED 3/25/99

EXHIBIT

P0288 CROSS POSTING FOR LEADMAN POSITION FOR PARKS
DEPARTMENT DATED 5/17/99

P0289 CROSS POSTING FOR BACK-UP STREET SWEEPER POSITION
8/30/99

P0290 LETTER FROM PERKINS 12/18/95 TO MAXWELL REF COOK
DRIVING BACKHOE AND HUBBARD INTERFERING WITH
OPERATION OF PUBLIC WORKS AND WHO IS IN CHARGE

P0291 PERKINS LETTER 4/18/96 TO EDWARDS TO SET GRIEVANCE
HEARING

P0292 PERKINS LETTER 9/4/96 TO CROSS REF POLICY CHANGES

P0293 PERKINS LETTER 2/5/97 TO CROSS REF POSTING OF MEMOS

P0294 PERKINS LETTER TO HUBBARD REF CHANGE OF HOURS
DATED 7/18/97

P0295 GOOD WORK LETTER FOR PUBLIC WORKS EMPLOYEES
INCLUDING HYDRANT PROGRAM DATED 12/11/97 REF PERKINS

P0296 PERKINS LETTER TO EDWARDS TO SET GRIEVANCE HEARING

P0297 AUDITOR RECORDS FOR PERKINS VACATION AND SICK TIME
IN MAY 1998

P0298 TYPED JOB DESCRIPTION OF SHANAHAN UNDATED

P0299 TYPED JOB DESCRIPTION OF JONES UNDATED

P0300 TYPED JOB DESCRIPTION OF HARRIS UNDATED

P0301 TYPED JOB DESCRIPTION OF LACINAK UNDATED

E X H I B I T

P0302 TYPED JOB DESCRIPTION OF DYKES UNDATED

P0303 TYPED JOB DESCRIPTION OF ENDERLIN UNDATED

P0304 TYPED JOB DESCRIPTION OF WALTZ UNDATED

P0305 TYPED JOB DESCRIPTION OF SMITH UNDATED

P0306 TYPED JOB DESCRIPTION OF LYNN UNDATED

P0307 TYPED JOB DESCRIPTION OF ZIMMERMAN UNDATED

P0308 TYPED JOB DESCRIPTION OF ERWIN UNDATED

P0309 TYPED JOB DESCRIPTION OF GIBSON UNDATED

P0310 TYPED JOB DESCRIPTION OF BRATTON UNDATED

P0311 TYPED JOB DESCRIPTION OF STAPLETON UNDATED

P0312 TYPED JOB DESCRIPTION OF PERKINS UNDATED

P0313 TYPED JOB DESCRIPTION OF WHITE UNDATED

P0314 TYPED JOB DESCRIPTION OF COOK UNDATED

P0315 TYPED JOB DESCRIPTION OF SEXTON UNDATED

P0316 HANDWRITTEN JOB DESCRIPTION OF SEXTON UNDATED

P0317 HANDWRITTEN JOB DESCRIPTION OF JONES UNDATED

P0318 HANDWRITTEN JOB DESCRIPTION OF HARRIS UNDATED

P0319 HANDWRITTEN JOB DESCRIPTION OF LACINAK UNDATED

P0320 HANDWRITTEN JOB DESCRIPTION OF DYKES UNDATED

E X H I B I T

P0321 HANDWRITTEN JOB DESCRIPTION OF ENDERLIN UNDATED

P0322 HANDWRITTEN JOB DESCRIPTION OF WALTZ UNDATED

P0323 HANDWRITTEN JOB DESCRIPTION OF SMITH UNDATED

P0324 HANDWRITTEN JOB DESCRIPTION OF LYNN UNDATED

P0325 HANDWRITTEN JOB DESCRIPTION OF ZIMMERMAN UNDATED

P0326 HANDWRITTEN JOB DESCRIPTION OF ERWIN UNDATED

P0327 HANDWRITTEN JOB DESCRIPTION OF GIBSON UNDATED

P0328 HANDWRITTEN JOB DESCRIPTION OF SHANAHAN UNDATED

P0329 HANDWRITTEN JOB DESCRIPTION OF BRATTON UNDATED

P0330 HANDWRITTEN JOB DESCRIPTION OF STAPLETON UNDATED

P0331 HANDWRITTEN JOB DESCRIPTION OF PERKINS UNDATED

P0332 HANDWRITTEN JOB DESCRIPTION OF WHITE UNDATED

P0333 HANDWRITTEN JOB DESCRIPTION OF COOK DATED 8/5/96

P0334 HANDWRITTEN JOB POSTING FOR PARK LEADMAN UNSIGNED AND UNDATED

P0335 D. PENNINGTON CDL TEMPORARY PERMIT ISSUED 8/11/99

P0336 LAAKE LETTER 9/29/99 TO BLUMBERG WITH REF RANDOM DRUG TESTING FOR PUBLIC WORKS

P0337 CLINT ZIMMERMAN SICK LEAVE REQUEST DATED 11/17/98

E X H I B I T

P0338	THOMAS WHITE VACATION REQUEST DATED 11/2/98
P0339	THOMAS WHITE VACATION REQUEST DATED 9/1/98
P0340	THOMAS WHITE VACATION REQUEST DATED 12/1/97
P0341	NORWOOD FORM CDL ALCOHOL AND DRUG TESTING SIGN-OFF CERTIFICATE FOR DWAYNE SMITH DATED 9/21/99
P0342	CITY OF NORWOOD SEXUAL HARASSMENT POLICY
P0343	HUBBARD LETTER TO CROSS DATED 10/4/96
P0344	CROSS LETTER TO HOCHBEIN DATED 12/26/96
P0345	HOCHBEIN LETTER TO MORELAND DATED 1/28/96
P0346	HUBBARD LETTER TO CROSS DATED 3/18/97
P0347	HUBBARD LETTER TO WALTER EDWARDS DATED 3/1/96
P0348	HUBBARD LETTER TO CROSS DATED 3/10/97
P0349	HUBBARD LETTER TO MORDINO DATED 10/22/97
P0350	NORWOOD FORM CDL ALCOHOL AND DRUG TESTING SIGN-OFF CERTIFICATE FOR HUBBARD DATED 12/8/97
P0351	CROSS LETTER TO KENNEDY DATED 12/8/98
P0352	HUBBARD LETTER TO WIMMERS DATED 7/23/98
P0353	COOK LETTER TO LACINAK DATED 5/17/98
P0354	HUBBARD LETTER TO CROSS DATED 1/5/98
P0355	CROSS LETTER TO HUBBARD DATED 8/13/98

E X H I B I T

P0356 NORWOOD FORM CDL ALCOHOL AND DRUG TESTING
SIGN-OFF CERTIFICATE FOR COOK DATED 12/8/97

P0357 NORWOOD FORM CDL ALCOHOL AND DRUG TESTING
SIGN-OFF CERTIFICATE FOR ZIMMERMAN DATED 12/8/97

P0358 CITY OF NORWOOD JOB SPECIFICATION FOR HEAVY
EQUIPMENT OPERATOR UNDATED

P0359 CITY OF NORWOOD JOB SPECIFICATION FOR TRUCK DRIVER
UNDATED

P0360 CITY OF NORWOOD JOB SPECIFICATION FOR BUS DRIVER
UNDATED

P0361 CITY OF NORWOOD JOB SPECIFICATION FOR LABORER
UNDATED

P0362 CITY OF NORWOOD JOB SPECIFICATION FOR LEAD MAN
UNDATED

P0363 CITY OF NORWOOD JOB SPECIFICATION FOR METER READER
UNDATED

P0364 CITY OF NORWOOD JOB SPECIFICATION FOR A-1 MECHANIC
DATED 1-27-98

P0365 D. SMITH LETTER 5/24/99 TO CROSS

P0366 CROSS LETTER 10/20/99 TO SMITH

P0367 CROSS LETTER 7/7/98 TO SMITH

P0368 CROSS LETTER 6/18/98 TO SMITH

P0369 CROSS LETTER 2/19/98 TO SMITH

EXHIBIT

P0370	CROSS LETTER 8/12/97 TO SMITH
P0371	CROSS LETTER 7/29/97 TO SMITH
P0372	CROSS LETTER 6/27/97 TO SMITH
P0373	SMITH LETTER 10/16/98 TO WHOM IT MAY CONCERN
P0374	SMITH REPORT CONCERNING ACCIDENT ON 10/13/98
P0375	SMITH SICK LEAVE APPLICATION 9/20/99
P0376	SMITH SICK LEAVE APPLICATION 10/8/99
P0377	SMITH SICK LEAVE APPLICATION 12/10/96
P0378	SMITH SICK LEAVE APPLICATION 11/25/96
P0379	SMITH GROUP HEALTH ASSOCIATES WORK RESTRICTION 5/20/99
P0380	SMITH DRIVING PRIVILEGES 11/22/97 PER BMV
P0381	SMITH CDL LICENSE ISSUED ON 1/22/98
P0382	SMITH EXAMINER'S DRIVING PERMIT ISSUED ON 6/26/97
P0383	SMITH ACCIDENT REPORT FORM 10/7/98
P0384	SMITH ACCIDENT REPORT FORM ON 10/15/98
P0385	SMITH SICK LEAVE APPLICATION 7/16/99
P0386	SMITH SICK LEAVE APPLICATION ON 4/21/99
P0387	SMITH SICK LEAVE APPLICATION ON 6/21/99

E X H I B I T

P0388	SMITH SICK LEAVE APPLICATION ON 4/30/99
P0389	SMITH SICK LEAVE APPLICATION 9/16/98
P0390	SMITH APPLICATION FOR VACATION LEAVE ON 9/17/98
P0391	SMITH APPLICATION FOR VACATION LEAVE ON 8/3/98
P0392	SMITH SICK LEAVE APPLICATION 5/14/99
P0393	SMITH APPLICATION FOR VACATION LEAVE ON 3/10/99
P0394	SMITH APPLICATION FOR VACATION LEAVE ON 2/5/99
P0395	SMITH SICK LEAVE APPLICATION 11/12/98
P0396	SMITH SICK LEAVE APPLICATION 11/12/98
P0397	SMITH VACATION LEAVE APPLICATION FILED 10/26/98
P0398	SMITH SICK LEAVE APPLICATION 10/21/ 98
P0399	SMITH GRANTED A LEAVE OF ABSENCE ON 10-2-95
P0400	SMITH APPLICATION FOR VACATION ON 9/17/98
P0401	SMITH APPLICATION FOR LEAVE OTHER THAN SICK OR VACATION FILED ON 9/16/98
P0402	SMITH SICK LEAVE APPLICATION 5/14/98 FOR ½ DAY
P0403	SMITH SICK LEAVE APPLICATION 7/21/98
P0404	APPLICATION FOR LEAVE APPROVED BY CROSS FILED 6/29/98
P0405	SMITH SICK LEAVE APPLICATION 5/14/98

E X H I B I T

P0406	SMITH SICK LEAVE APPLICATION 12/30/97
P0407	SMITH SICK LEAVE APPLICATION 1/7/98 FOR 1/7/98
P0408	SMITH 97 APPLICATION FOR SICK OR VACATION TIME SMITH SICK LEAVE APPLICATION 10/31/97 APPROVED BY CROSS WITH DOCTOR EXCUSE
P0409	SMITH VACATION LEAVE APPLICATION 9/30/97
P0410	SMITH SICK LEAVE APPLICATION 9/16/97
P0411	SMITH APPLICATION FOR PERSONAL LEAVE ON 3/25/97
P0412	SMITH SICK LEAVE APPLICATION 6/24/97
P0413	SMITH SICK LEAVE APPLICATION ON 4/18/97
P0414	SMITH ACCIDENT REPORT 8/27/97
P0415	SMITH VACATION APPLICATION 4/15/97
P0416	SMITH SICK LEAVE APPLICATION 8/13/97
P0417	SMITH SICK LEAVE APPLICATION 9/24/96
P0418	CRAFTSMAN WATER SERVICE REPRESENTATIVE JOB DESCRIPTION
P0419	CHECKOUT LIST FOR EQUIPMENT BORROWED FROM PUBLIC WORKS
P0420	AFFIDAVIT OF RANDY HARRIS
P0421	LETTER 8/24/98 TO DENNIS J. COOK FROM MICHAEL REA, OBES
P0422	ENQUIRER PHOTO OF DENNIS COOK DRIVING BACKHOE FOR

EXHIBIT

CITY 4/96

P0423 LETTER 1/5/98 TO KEVIN CROSS FROM GARY HUBBARD

P0424 LETTER 1/5/98 TO RAY ERWIN FROM HUBBARD RE GRIEVANCE
12328

P0425 LETTER 1/6/98 TO RAY ERWIN FROM HUBBARD RE GRIEVANCE
12326

P0426 LETTER 1/13/98 TO RAY ERWIN FROM HUBBARD, PAGE ONE

P0427 LETTER 1/13/98 TO RAY ERWIN FROM HUBBARD, PAGE TWO

P0428 LETTER 1/14/98 TO RAY ERWIN FROM CROSS

P0429 DRUG & ALCOHOL POLICY, CITY OF NORWOOD CDL

P0430 LETTER 1/16/98 TO CROSS FROM HUBBARD RE HOURS OF
WORK

P0431 LETTER 1/16/98 TO RAY ERWIN FROM HUBBARD RE
GRIEVANCE 12330

P0432 LETTER 1/16/98 TO RAY ERWIN FROM HUBBARD RE
GRIEVANCE HEARING

P0433 LETTER 1/18/98 TO COOK FROM CROSS RE CONVERSATION
WITH RGK

P0434 LETTER 1/19/98 TO PERKINS FROM HUBBARD

P0435 LETTER 1/21/98 TO CROSS FR HUBBARD NOTICE PLEASE POST

P0436 LETTER 1/22/98 TO CROSS FR HUBBARD RE SICK LEAVE

P0437 LETTER 1/23/98 TO ERWIN FROM HUBBARD RE GRIEVANCE

EXHIBIT

12329

P0438	LETTER 1/28/98 TO LOCAL 914 FROM HUBBARD RE WORK SCHEDULES
P0439	LETTER 1/29/98 TO JONES FROM CROSS CHARGING ART 14 SEC 11
P0440	LETTER 1/29/98 TO RGK FROM HUBBARD RE RAY ERWIN OFFER
P0441	LETTER 1/29/98 TO CROSS FROM HUBBARD RE WEARING UNIFORMS
P0442	MEMO 1/29/98 TO PUBLIC WORKS EMPLOYEES FROM CROSS
P0443	MEMO 1/29/98 TO PW EMPLOYEES FROM CROSS RE USE OF RADIO
P0444	MEMO TO CROSS FROM KENNEDY RE DENNIS JONES SICK LEAVE
P0445	SPREADSHEET ATTACHED TO P0444 MEMO
P0446	LETTER 2/13/98 HUBBARD'S FINDINGS FROM 2/12/98 GRIEV MEETING
P0447	LETTER 2/17/98 TO PERKINS FROM CROSS ISSUING ORAL WARNING
P0448	LEADMAN RESPONSIBILITIES
P0449	LETTER 2/19/98 TO JEFF SMITH FROM CROSS RE ORAL WARNING
P0450	LETTER 2/19/98 TO ERWIN FROM CROSS RE COOK'S LOG AND CREWS

EXHIBIT

P0451 MEMO 2/20/98 TO LEADMEN FROM CROSS RE EMERGENCY CALL-OUTS

P0452 SIGN ADVISING LOCAL 914 OF MEETING 2/20/98 AT 11:00 A.M

P0453 LETTER 2/24/98 TO ERWIN FROM CROSS CHARGING INSUB AND NEGLECT

P0454 CROSS LETTER TO HUBBARD DATED 12/8/98

P0455 POSTING OF NEW START TIMES EFFECTIVE MARCH 9, 1998

P0456 NOTICE TO DENNIS/TONI COOK DATED 3/10/98 FROM ROHRIG

P0457 ATTACHMENT TO P0456 NOTICE

P0458 LETTER 3/11/98 TO PERKINS FROM CROSS RE JOBS TO GET DONE

P0459 LETTER 3/11/98 TO COOK FROM CROSS RE WRITTEN WARNING

P0460 LETTER 3/12/98 TO CROSS FROM HUBBARD REMOVING PERKINS

P0461 LETTER 3/17/98 TO ERWIN FROM BAZZANO RE MARCH 9 HEARING

P0462 LETTER 3/20/98 TO CROSS FROM HUBBARD RE VEHICLE 472

P0463 LETTER 3/24/98 TO COOK FROM CROSS LEADMAN RESPONSIBILITIES

P0464 LETTER 3/24/98 TO COOK FROM CROSS RE CLEANING THE SWEEPER

P0465 LETTER 3/24/98 TO PERKINS FROM CROSS LEADMAN

EXHIBIT

RESPONSIBILITIES

P0466	LETTER 3/25/98 TO COOK FROM CROSS CHARGING EQUIPMENT MISUSE
P0467	LETTER 3/26/98 TO COOK FROM CAMERON NOTICE OF 4/1/98 HEARING
P0468	JOB POSTING - STREET CREW LEADMAN
P0469	LETTER 7/2/98 TO COOK FROM HUBBARD RE JACKHAMMER, SICK LEAVE
P0470	LETTER 7/6/98 TO COOK FROM HUBBARD ORDERING PHYSICAL EXAM
P0471	LETTER 7/7/98 TO CROSS FROM HUBBARD RE TAKING CITY PROPERTY
P0472	CROSS LETTER TO HUBBARD DATED 8/13/98
P0473	LETTER 7/13/98 TO COOK FROM HUBBARD ORDERING PSYCH EXAM
P0474	LETTER 7/13/98 TO PERKINS FROM CROSS ASSIGNING TO STREET DEPT
P0475	LETTER 7/14/98 TO COOK FROM HUBBARD RE USE OF CAR FOR APPT.
P0476	LETTER 7/20/98 TO COOK FROM CROSS RE REFUSAL TO SIGN WAIVER
P0477	LETTER 7/22/98 TO CROSS FROM HUBBARD RE COOK NOT DRIVING
P0478	LETTER 7/22/98 TO COOK FROM HUBBARD RE COOK NOT

EXHIBIT

DRIVING

P0479	LETTER 7/23/98 TO COOK FROM HUBBARD ORDERING PSYCH EVAL
P0480	LETTER 7/23/98 TO COOK FROM HUBBARD ORDERING SIGNING RELEASE
P0481	LETTER 7/28/98 TO COOK FROM HUBBARD RE WRITTEN WARNING
P0482	APPLICATION FOR SICK OR VACATION TIME COOK 7/29/98
P0483	LETTER 7/29/98 TO COOK FROM HUBBARD RE STATEMENTS MADE 7/29
P0484	LETTER 7/30/98 TO COOK FROM CROSS ORAL WARNING NO MASK
P0485	MEMO TO PWE FROM CROSS RE TAKING OFF AFTER CLOCKING IN
P0486	LETTER 7/31/98 TO LACINAK FROM CROSS DENYING GRIEVANCE #4692
P0487	LETTER 8/3/98 TO CROSS FROM HUBBARD RE POSTING PROPER SIGNAGE
P0488	LETTER 8/26/98 TO PERKINS/COOK FROM CROSS SETTING 9/3 HEARING
P0489	LETTER 8/11/98 TO PERKINS FROM BAZZANO RE GRIEVANCE 12350
P0490	HUBBARD LETTER TO CROSS DATED 8/3/98

E X H I B I T

P0491	HUBBARD'S REFUSAL TO SIGN FOR GRIEVANCE 5177 ON 8/13 CALENDAR
P0492	LETTER 8/13/98 TO LACINAK FROM CROSS RE GRIEVANCE 5173
P0493	LETTER 8/13/98 TO HUBBARD FROM CROSS RE SERIOUS SAFETY VIOLATION.
P0494	LETTER 8/14/98 TO COOK FROM CROSS IMPOSING ADMINISTRATIVE LEAVE
P0495	LETTER 8/21/98 TO HOCHBEIN FROM CROSS RE PERKINS CHARGES
P0496	LETTER 8/26/98 TO PERKINS/COOK NOTIFYING OF 9/3 HEARING
P0497	LETTER 9/2/98 TO COOK/PERKINS RESCHEDULING HEARING TO 9/8/98
P0498	LETTER 9/14/98 TO COOK/PERKINS RE HEARING OF 9/8/98
P0499	LETTER 10/1/98 TO EDWARDS FROM HUBBARD RE GRIEVANCE 5171
P01000	LETTER 10/2/98 TO EDWARDS FROM HUBBARD RE 10/1/98 LETTER
P01001	LETTER 10/26/98 TO COOK FROM CROSS RE RETURN TO WORK
P01002	LETTER 11/6/98 TO COOK FROM CROSS RE BATHROOM BREAKS
P01003	LETTER 11/13/98 TO COOK FROM HUBBARD RE M.D. APPT. 11/13/98

E X H I B I T

P01004 LETTER 11/19/98 TO COOK FROM HUBBARD - NOW COOK CAN DRIVE

P01005 LETTER 12/3/98 TO COOK FROM HUBBARD RE VACATION REQUEST

P01006 LETTER 12/15/98 TO KENNEDY FROM WALL RE COOK'S VACATION

P01007 LETTER 12/28/98 TO COOK FROM HUBBARD RE GRIEVANCE 1087

P01008 LETTER 12/28/98 TO COOK FROM HUBBARD RE VACATION REQUESTS

P01009 APPLICATION FORM ATTACHED TO 901031 LETTER

P01010 APPLICATION FORM ATTACHED TO 901031 LETTER

P01011 LETTER 1/6/99 TO EDWARDS FROM HUBBARD RE GRIEVANCE 1087

P01012 LETTER 1/29/99 TO RGK FROM WALL RE PERKINS RETURN TO WORK

P01013 LETTER 2/16/99 TO WHITE FROM CROSS RE LEADMAN PAY FOR COOK

P01014 NOTE ON RIVERFRONT STEEL NOTE PAPER

P01015 MEMO 2/25/99 TO PWE FROM CROSS RE PERSONAL PROPERTY

P01016 MEMO 3/1/99 TO PWE FROM CROSS RE I.D. BADGES

EXHIBIT

P01017 MEMO 3/4/99 TO PWE FROM CROSS RE RADIO PROCEDURES

P01018 LETTER 3/14/99 TO CROSS FROM HUBBARD - SAFETY MANUAL

P01019 VEHICLE OPERATION PAGE (ATTACHED TO 901097)

P01020 LETTER 4/6/99 TO COOK FROM SMITH - WRITTEN WARNING

P01021 MEMO 4/8/99 TO PWE RE UPDATE SAFETY POLICY & PROCEDURE

P01022 NOTICE FROM HUBBARD TO PWE TO RETURN UNIFORM SHORTS

P01023 LETTER 6/1/99 TO RGK FROM S. WALL RE COOK WORK RESTRICTIONS

P01024 CITY OF NORWOOD SAFETY POLICIES AND PROCEDURES FOR PUBLIC WORKS

P01025 LETTER 4/11/97 FROM PERKINS TO JONES WHY DUTIES WEREN'T DONE

P01026 LETTER 5/5/97 TO OSTERDAY FROM HUBBARD RE PROBATIONARY PERIOD

P01027 LETTER 5/6/97 TO SMITH FROM HUBBARD MOVING HIM TO STEP B

P01028 LETTER 6/26/97 TO HUBBARD FROM CROSS RE JONES'S DEPARTMENT

E X H I B I T

P01029 LETTER 7/30/97 TO HUBBARD FROM CROSS RE BACKHOE OPERATORS

P01030 LETTER 8/1/97 TO COOK FROM HUBBARD RE MEDICAL EXCUSES

P01031 LETTER 9/24/97 TO CROSS FROM HUBBARD RE DYKES ORAL WARNING

P01032 MEMO 9/26/97 TO PWE FROM CROSS RE LEAVING SCENE OF ACCIDENT

P01033 LETTER 10/21/97 TO ERWIN FROM HUBBARD RE WATER LABORER B1

P01034 LETTER 10/21/97 TO ERWIN FROM HUBBARD RE GRIEVANCE #12316

P01035 DAVENPORT RECEIPT FOR PAGER DATED 4/16/98

P01036 CROSS LETTER TO HUBBARD DATED 6/30/98 CONCERNING DAVENPORT PROBATIONARY PERIOD

P01037

P01038

P01039 LETTER 10/31/97 TO ERWIN FROM HUBBARD RE GRIEVANCES 12315/16

P01040 LETTER 11/3/97 TO CROSS FROM HUBBARD RE CDL TEMPORARY LIC

P01041 LETTER 11/12/97 TO CROSS FROM HUBBARD RE POSTING

E X H I B I T

WATER LABORER

P01042	LETTER 11/18/97 TO IRWIN (SIC) FROM HOCHBEIN RE GRIEV 12316
P01043	LETTER 12/5/97 TO ERWIN FROM HUBBARD RE ONE DAY UNION LEAVE
P01044	LETTER 12/5/97 TO ERWIN FROM HUBBARD RE SNOW OVERTIME
P01045	LETTER 12/9/97 TO PARTIN FROM HUBBARD RE PROBATIONARY PERIOD
P01046	LETTER 12/16/97 TO ZIMMERMAN RE WATER LABORER B1
P01047	MEMO 12/18/97 TO LEADMEN FROM CROSS RE LUNCH TIME
P01048	
P01049	LETTER 12/29/97 TO ERWIN FROM HUBBARD RE SUSPENSION FOR INSUB
P01050	LETTER 1/5/98 TO CROSS FROM HUBBARD RE SWEEPER OPERATOR II
P01051	LETTER 4/2/98 TO COOK FROM CROSS RE DIG OUT HOT PATCH
P01052	LETTER 4/3/98 TO CROSS FROM COOK ASKING FOR COPIES
P01053	LETTER 4/3/98 TO COOK FROM CROSS RE CONES AND BARRICADES

E X H I B I T

P01054 LETTER 4/3/98 TO COOK FROM CROSS SETTING HEARING
4/9/98

P01055 LETTER 4/6/98 TO COOK FROM CROSS RE UNATTENDED
TRUCK 453

P01056 COOK'S STATEMENT IN RESPONSE TO #P636 LETTER

P01057

P01058 LETTER 4/7/98 TO COOK FROM CROSS RE JONES AND
CONCRETE REPAIR

P01059

P01060 LETTER 4/13/98 TO CROSS FROM HUBBARD RE LEADMAN
OF STREET DEPT

P01061 AGREEMENT AND RELEASE ON GRIEVANCES 13392 AND 413

P01062 GRIEVANCE # 13392

P01063 GRIEVANCE REPORT

P01064 ADDENDUM TO CONTRACT LOCAL 914 TOOL ALLOWANCE

P01065 LETTER 4/13/98 TO CROSS FROM HUBBARD RE COOK,
JACKHAMMER

P01066 LETTER 4/13/98 TO CROSS FROM HUBBARD PERSONAL USE
OF CITY EQUIPMENT

EXHIBIT

P01067	LETTER 4/17/98 TO COOK FROM HUBBARD RE COOK BEING THREATENED
P01068	LETTER 4/20/98 TO COOK FROM HUBBARD RE FAX MACHINES
P01069	LETTER 4/20/98 TO COOK FROM CROSS TO CALL IN LOCATIONS
P01070	LETTER 4/21/98 TO COOK FROM HUBBARD RE FALSE STATEMENTS
P01071	LETTER 4/24/98 TO COOK FROM WIMMERS RE VACATION AUTHORIZ.
P01072	LETTER 4/24/98 TO COOK FROM HUBBARD RE VACATION
P01073	APPLICATION FOR LEAVE (ATTACHED TO P723)
P01074	LETTER 4/30/98 TO COOK RE CROSS RE ASKING LEO OSTERDAY
P01075	BOOK OF MEMOS ISSUED AROUND MAY 1998
P01076	LETTER 5/7/98 TO PERKINS FROM HUBBARD ACCEPTING RESIGNATION
P01077	LETTER 5/7/98 TO PERKINS RE HUBBARD CANCELING HEARING OF 5/12
P01078	LETTER 5/7/98 TO WIMMERS FROM HUBBARD RE PERKINS PAY
P01079	LETTER 5/13/98 TO PERKINS FROM CROSS RE MILLCREST SOCCER FIELD
P01080	LETTER 5/20/98 TO CROSS FROM HUBBARD RE COOK'S CDL

EXHIBIT

P01081	LETTER 5/21/98 TO LACINAK FROM CROSS RE GRIEVANCE 4688
P01082	LETTER 4/21/98 TO LACINAK FROM CROSS RE GRIEVANCE 12345/12350
P01083	LETTER 4/22/98 TO OSTERDAY FROM CROSS RE JOB AS LEADMAN
P01084	LETTER 6/18/98 TO SMITH FROM CROSS RE SUSPENSION
P01085	LETTER 8/20/98 TO CROSS FROM JONES NOT RESIGNING, HOSPITALIZED
P01086	LETTER 8/20/98 TO ERWIN FROM JONES RE UNION REPRESENTATION
P01087	LETTER 8/25/98 TO CROSS FROM JONES ENCL APPEAL AND REQUEST
P01088	
P01089	PETITION ASKING FOR COOK TO BE REMOVED AS UNION STEWARD
P01090	DAILY LOG - STREET DEPARTMENT - 3/26/98
P01091	DAILY LOG - STREET DEPARTMENT - 3/30/98
P01092	DAILY LOG - STREET DEPARTMENT - 4/3/98
P01093	DAILY LOG - STREET DEPARTMENT - 4/3/98

E X H I B I T

P01094 DAILY LOG - STREET DEPARTMENT - 4/9/98

P01095 DAILY LOG - STREET DEPARTMENT - 3/26/98 (SAME AS 2036)

P01096 ROGER PERKINS' CHECK FOR 3 DAYS JURY SERVICE \$22.50

P01097 ROGER PERKINS' CHECK FOR 2 DAYS JURY SERVICE \$15.00

P01098 MEDICAL NOTE FROM GHA DATED 3/26/98 RE ROGER PERKINS

P01099

P01100 FEE STATEMENT OF GEORGE PARSONS, PH.D

P01101

P01102 VIDEOTAPE OF CROSS AND HUBBARD AT NORWOOD MOOSE

P01103 AUDIOTAPES OF CONVERSATIONS BETWEEN NORWOOD PUBLIC WORKS EMPLOYEES AND PERKINS, COOK, ERWIN AND JONES

P01104 PERSONNEL FILE OF CLINT ZIMMERMAN PRODUCED BY THE CITY OF NORWOOD

P01105 MEDICAL RECORDS OF DR. DAVID HELM

P01106 PAY RECORDS FOR DENNIS COOK FOR 12/21/97 THRU 1/3/98

P01107 CROSS LETTER TO KENNEDY DATED 12/8/98

E X H I B I T

P01108 CROSS LETTER TO KENNEDY DATED 1/12/98

P01109 COOK LETTER TO AFSCME CARE PLAN DATED 10/30/99

P01110 WALL LETTER TO KELLY DATED 11/9/99

P01111 CROSS LETTER TO WIMMERS DATED 8/9/99

P01112 CROWLEY LETTER TO HAMILTON COUNTY FOOD STAMP
PROGRAM DATED 4/7/89

P01113 MILLER LETTER TO FORD DATED 5/1/96

P01114 COOK SETTLEMENT AGREEMENT DATED 7/12/96

P01115 PERS LETTER TO MOLONY DATED 10/29/99

P01116 WALL LETTER TO KELLY DATED 3/7/00

P01117 WALL LETTER TO KENNEDY DATED 3/2/00

P01118 SERB SETTLEMENT AGREEMENT TO COOK'S ULPS DATED
MAY 1998

P01119 HUBBARD LETTER TO COOK DATED 11/19/98

P01120 HUBBARD LETTER TO COOK DATED 7/6/98

P01121 HUBBARD LETTER TO COOK DATED 7/22/98

P01122 MEDICAL REPORT FOR DENNIS COOK DATED 11/21/97

P01123 MEDICAL REPORT OF DR. MIDDAUGH DATED 2/10/00

P01124 COOK BWC CLAIM INFORMATION REPORT DATED 6/24/99

E X H I B I T

P01125 INDUSTRIAL COMMISSION ORDER DATED 12/17/99

P01126 LISTING OF CITY OF NORWOOD EMPLOYEES

P01127 ANNUAL REPORTS OF NORWOOD LAW DIRECTOR

P01128 MEDICAL EXPENSES OF DENNIS COOK